

May 28, 2009

Ms. Alexandra T. Broomhead
Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Broomhead:

The Oregon Republican Party is in receipt of your Request for Additional Information dated May 8, 2009, concerning our amended October 2008 monthly FEC report.

With respect to receipts from organizations which are not registered with the Commission as political committees, no receipt amount from these county Republican committees exceeds the \$ 1,000 threshold above which the organizations would be required to register with the Commission. Further, the Party confirmed with each entity that the funds used for the donation to the Party consisted of contributions permissible under the Federal Election Campaign Act, as amended, and that the organization was able to demonstrate this compliance through a reasonable accounting method. Accordingly, the Party is permitted to retain these contributions in its federal account, and neither transfers to our non-federal account nor refunds to the contributors are required.

In consultation with Commission staff, the Party has undertaken a comprehensive review and reconciliation of all activity for 2007 and 2008. The review team included a Certified Public Accountant and firms that specialize in FEC reporting and compliance.

In January of 2009, upon completion of this review, the Party filed amended FEC reports for the 2007-2008 cycle which corrected totals for receipts, disbursements, debts, and beginning and ending cash. These are the amendments to which party representatives referred in their introductory meeting with you at the FEC in January of this year.

As a result of the review, the amount referenced in your letter was verified as the correct additional disclosure amounts for reportable debt for this report.

The receipt referenced in your letter from John McCain 2008, Inc. was a reimbursement for rent expense, calculated at fair market value, in accordance with the square footage utilized by the McCain campaign. Our rent payments were made to Emmert Development Company.

The Party has reviewed the transfers received from the Republican National Committee, and all payments made for "Volunteer-exempt yard signs" as referenced in your letter. These payments were not for public advertising, and the campaign materials were not distributed by direct mail (i.e., by a commercial vendor or from commercial lists). All funds used for the activities were permitted under the Federal Election Campaign Act, as amended. These campaign materials were distributed by volunteers. None of the funds used were designated for a particular candidate, and no payments for the activities were made using any transfers-in received from the RNC or from any national party committee.

Therefore, these disbursements met the Commission's requirements as exempt from the definition of a contribution or expenditure on behalf of any specifically identified federal candidate. The payments are correctly itemized on Schedule B for Line 30b, and do not require a Schedule E or Schedule F for Lines 24 or 25.

ETEXT ATTACHMENT

The Party has filed an amended October 2008 monthly report to reflect that the Schedule H3 transfers from our non-federal account came from the Oregon Non-Fed State Account c/o Key Bank.

The Party has reviewed the disbursements reported on Line 21b that were described as "List rental-OR GOP". These expenditures were for Party fundraising purposes, and were not expenditures for Voter Identification, Generic Campaign or Get-out-the-vote activity conducted in connection with an election in which one or more candidates for Federal office appeared on the ballot (and thus do not qualify as Federal Election Activity). As Party fundraising expenditures, these payments are properly itemized on Schedule B for Line 21b.

Sincerely,

Dennis Morgan
Treasurer